

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**LORENE G. BROCIOSUS, as  
Personal Representative of the Estate of  
JAMES A. COPPAGE,**

**Plaintiff,**

**v.**

**UNITED STATES STEEL CORPORATION,  
ET AL.,**

**Defendants**

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**Case No. 1: 18-cv-003823-SAG**

**PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF HER OPPOSITION TO  
DEFENDANT SUN CHEMICAL CORPORATION & RYCOLINE PRODUCTS, INC.'S  
JOINTER MOTION TO EXCLUDE PLAINTIFF'S  
EXPERT DR. ROBERT HERRICK**

Plaintiff, by and through her counsel of record, hereby submits this Memorandum of Law in Support of her Opposition to Defendant Sun Chemical Corporation's & Rycoline Products, Inc.'s Joinder Motion to Exclude Dr. Herrick and in thereof fully adopts and incorporates by reference all facts and arguments set forth in her opposition to United States Steel's Motion to Exclude Dr. Herrick as if more fully incorporated herein.

**WHEREFORE**, Plaintiff respectfully requests that this Honorable Court deny Defendant's Motion to Exclude Dr. Herrick for the reasons stated above, as Dr. Herrick's opinions related to 1) Mr. Coppage's use of Sun Chemical Company's cleaning solvent, and 2) the benzene content of the solvents that he used are based upon the facts of the case and utilize reliable methodology.

Respectfully Submitted,

Dated: January 6, 2020

By: /s/ Timothy A. Burke  
ANDREW J. DUPONT, ESQUIRE  
TIMOTHY A. BURKE, ESQUIRE  
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**Case No. 1: 18-cv-003823-SAG**

**CERTIFICATE OF SERVICE**

The undersigned, does hereby certify that a true and correct copy of the foregoing was served upon all parties by Electronic Case Filing on this date.

Respectfully submitted,

Dated: January 6, 2020

By: /s/ Timothy A. Burke  
ANDREW J. DUPONT, ESQUIRE  
TIMOTHY A. BURKE, ESQUIRE  
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